

### **REMARKS**

Applicant acknowledges the Examiner's withdrawal of the claim objection, 35 U.S.C. § 112 rejection, and 35 U.S.C. § 101 rejection of record in the November 11, 2003 Office Action.

#### **Status of the Application**

Claims 1-42 are all the claims pending in the Application, as claims 38-42 are hereby added. Claims 1-37 have been rejected.

#### **Anticipation Rejection**

The Examiner has rejected claims 1-37 under 35 U.S.C. § 102(e) as being anticipated by *Garg et al.* (US 6,625,603 B1; hereinafter "*Garg et al.*").<sup>1</sup> This rejection is respectfully traversed.

*Garg* discloses an access control system (see FIG. 2) that operates within kernel 235 of an operating system 200 of a computer (col. 3, lines 12-26). Each object (*e.g.*, files or folders) stored in the operating system 200 is assigned a GUID that is "not to be re-used by another application" in the operating system 200 (col. 6, line 60 - col. 7, line 6). When applications running in operating system 200 seek to access an object, the applications call service provider module 210, which checks with access control module 240 (col. 13, line 60 - col. 14, line 12) to

---

<sup>1</sup> The Examiner has only specifically rejected claims 1-16 under 35 U.S.C. § 102. However, it is believed that the Examiner intended to reject all of the pending claims per the Office Action cover sheet and the discussion in the Office Action.

review an access control list of the object (col. 8, lines 23-28), which lists USERIDs or GROUPIDs that are allowed access to the object (col. 8, lines 33-38).

Applicant respectfully submits that *Garg*'s system has nothing at all to do with the claimed system of the instant Application, as it is directed to an access system within an operating system, not an access system utilizing UUIDs. Similarly to the techniques disclosed in the background section of the application, the security system of *Garg* would have to be repeatedly provided in different domains, as no UUIDs are disclosed. Accordingly, *Garg* is no more relevant than that prior art.

First, *Garg* completely fails to teach or suggest: (1) an identifier that is "unique within and outside of the storage system," as recited in independent claims 1, 6, 10, 17, 22; (2) a "universal unique identifier" as recited in claim 24; or (3) a "globally unique identifier" as recited in claims 27, 30, 34 and 36. Rather, *Garg*'s GUID is disclosed only as being unique within operating system 200 on computer 20. There is no teaching or suggestion that GUID would be unique outside of *Garg*'s operating system.

Further, the Examiner has not explained how the GUID of *Garg*, which is related to objects, could possibly teach or suggest that the "universal unique identifier" or "globally unique identifier" is for a user, as recited in independent claims 24, 27, 30, 34, 36. Rather, *Garg* utilizes

USERIDs and GROUPIDs for users, not GUIDs. Furthermore, *Garg* fails to teach or suggest that either USERIDs or GROUPIDs are in any way universally or globally unique.

The Examiner alleges, on page 11 of the Office Action, that a GUID can be a UUID, but cites no particular reference that would support this allegation. Rather, as described above, *Garg* at best indicates that its GUID is only uniquely provided vis-à-vis applications in the operating system, and is only directly related to objects. Thus, *Garg*'s GUIDs cannot reasonably be read as comparable to UUIDs or as relating to users.

Thus, Applicant respectfully submits that independent claims 1, 6, 10, 17, 22, 24, 27, 30, 34 and 36 are patentable over the applied reference. Further, Applicant respectfully submits that rejected dependent claims 2-5, 7-9, 11-16, 18-21, 23, 25, 26, 28, 29, 31-33 35 and 37 are allowable, *at least* by virtue of their dependency.

Thus, Applicants respectfully request that the Examiner withdraw this rejection.

**New Claims**

New dependent claims 38-42 are hereby added. Claims 38-42 are fully supported at least by pages 7-10 of the specification.

Conclusion

In view of the foregoing, it is respectfully submitted that claims 1-42 are allowable.  
Thus, it is respectfully submitted that the application now is in condition for allowance with all of the claims 1-42.

If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Please charge any fees which may be required to maintain the pendency of this application, except for the Issue Fee, to our Deposit Account No. 19-4880.

Respectfully submitted,

SUGHRUE MION, PLLC  
Telephone: (202) 293-7060  
Facsimile: (202) 293-7860

WASHINGTON OFFICE

23373

CUSTOMER NUMBER

*Billy Carter Raulerson*  
for BILLY CARTER RAULERSON  
Timothy P. Cremen  
Registration No. 50,855

REG. NO.  
52,156

Date: July 22, 2004